

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: MATTHEW SCOTT BAKER and	:	CHAPTER 1
JILLIAN LYNNE BAKER	:	
Debtor(s)	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
MATTHEW SCOTT BAKER and	:	
JILLIAN LYNNE BAKER	:	
Respondent(s)	:	CASE NO. 4-18-bk-04368

TRUSTEE'S AMENDED OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 19<sup>th</sup> day of March, 2019, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Debtor(s)' plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required. More specifically,

Trustee alleges and avers that debtor(s)' disposable income is greater than that which is committed to the plan based upon the Means Test calculation and specifically disputes the following amounts:

- a. Actual taxes incurred with tax refund adjustment – Line 16.
- b. Educational expenses – Line 29.
- c. Health care – Lines 7 and 22 (verification)
- d. Telecommunication services – Line 23 (verification)
- e. Additional food and clothing expense verification – Line 30.

2. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:

- a. 2018 Federal Income Tax return.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Agatha R. McHale  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 19th day of August, 2019, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Daniel Foster, Esquire  
P.O. Box 966  
Meadville, PA 16335

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee